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Attorneys for Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES DIVISION

In re: _____ | Case No.: 2:21-bk-18205-DS

CRESTLLOYD, LLC | Chapter 11 Case

Debtor and Debtor in Possession.

**DEBTOR'S NOTICE OF MONTHLY FEE
STATEMENT OF SIERRA CONSTELLATION
PARTNERS, LLC**

[May 1, 2022 through May 31, 2022]

[No Hearing Required, Unless Timely Opposition and Request for a Hearing is Filed]

1 **PLEASE TAKE NOTICE** that, (A) on October 28, 2021, Crestlloyd, LLC, the Chapter
2 11 debtor and debtor in possession herein (the “Debtor”), filed a *Notice of Setting/Increasing Insider*
3 *Compensation* (the “Notice of Insider Compensation”) for SierraConstellation Partners LLC/Lawrence
4 R. Perkins (“SCP”) and served it on the UST and other parties, (B) on November 16, 2021, the United
5 States Trustee (the “UST”) filed its *Objection To Notice Of Insider Compensation* (the “Objection”)
6 [Dkt. 35] objecting to SCP’s Notice of Insider Compensation, (C) on December 13, 2021, the Debtor
7 filed its *Stipulation [With the UST] (1) Resolving UST Objection To Notice Of Insider Compensation*
8 *And (2) Vacating Hearing Thereon* (the “Insider Compensation Stipulation”) [Dkt. 72], (D) on
9 December 16, 2021, the Court entered its *Order Approving Stipulation [With the UST] (1) Resolving*
10 *UST Objection To Notice Of Insider Compensation And (2) Vacating Hearing Thereon* (the “Insider
11 Compensation Order”) [Dkt. 77].

12 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation
13 Stipulation and Insider Compensation Order, “SCP must file monthly fee statements [each a “Fee
14 Statement”] and serve the UST therewith, and, absent an objection by the UST or some other party in
15 interest within seven (7) days thereafter, the fees and costs may be paid in full. In the event of an
16 objection, the undisputed portion may be paid without prejudice to the balance subject to order of the
17 Court.”

18 **PLEASE FURTHER TAKE NOTICE THAT**, consistent with the foregoing procedure,
19 on December 12, 2021, the Court entered its *Interim Order* [the “DIP Order” [Dkr. 70]] *Granting*
20 *Motion For Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant*
21 *To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And*
22 *Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief* [the “DIP Motion”]
23 [Dkt. 66]], which, *inter alia*, granted the DIP Motion on an interim basis and approved the terms of the
24 DIP Loan Documents,¹ which provide, among other things, that:

25 Loan Proceeds shall be used solely in accordance with the Budget,
26 including for payment of the Facility Fee, Lender's reasonable
27 attorneys' fees and costs incurred in making and documenting the
Loan, title insurance premiums, escrow fees, the Extension Fee,

28 _____
¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them in the DIP Motion.

1 and the Carve Out and Borrower's working capital needs and to
2 administer the Chapter 11 Case, including insurance, repair,
3 maintenance and construction costs with respect to the Property.
4 With respect to the fees and costs of the Manager of the Debtor
[i.e., SCP], Manager [i.e., SCP] shall file monthly fee statements
5 and, absent an objection within seven (7) days thereafter, the fees
and costs may be paid in full. In the event of an objection, the
6 undisputed portion may be paid without prejudice to the balance
subject to order of the Court.

7 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation
8 Stipulation, Insider Compensation Order, DIP Motion, and DIP Order, SCP hereby files its Fee
9 Statement for the period from May 1, 2022 through May 31, 2022. SCP reserves its right to
10 supplement, amend, or modify the Fee Statement to include fees and/or expenses incurred during the
11 foregoing period not covered in the attached Fee Statement or incurred subsequent to May 31, 2022.

12 Annexed as **Exhibit “A”** hereto is the name of each professional who performed services
13 for the Debtor in connection with this chapter 11 case during the period covered by this Fee Statement
14 and the hourly rate and total fees for each professional during such period.

15 Annexed as **Exhibit “B”** hereto is the summary of hours in this Fee Statement broken up
16 by partner and task.

17 Annexed as **Exhibit “C”** hereto are the detailed time entries for the period covered by this
18 Fee Statement.

19 Annexed as **Exhibit “D”** hereto is the summary of expenses included in this Fee
20 Statement.

21 Annexed as **Exhibit “E”** hereto are the detailed entries for the expenses covered by this
22 Fee Statement.

23 **PLEASE TAKE FURTHER NOTICE that objections, if any, to this Fee Statement
24 must be filed with the Court and served so as to be received by the undersigned counsel to the
25 Debtor no later than seven (7) days after the filing of this Fee Statement.**

1 **PLEASE TAKE FURTHER NOTICE** that, (A) if no objection is properly and timely
2 filed and served in accordance with the above procedures, the Debtor will pay SCP the fees and
3 expense set forth in this Fee Statement (provided such payment is consistent with the Budget) and (B)
4 if an objection is properly and timely filed and served in accordance with the above procedures, (1) the
5 Debtor will pay SCP the undisputed portion of fees and expenses set forth in this Fee Statement
6 (provided such payment is consistent with the Budget) and (2) any disputed portion of fees and
7 expenses set forth in this Fee Statement shall be subject to review and further order by the Court.

8 Dated: June 14, 2022

CRESTLLOYD, LLC

9 */s/ Todd M. Arnold*

10 DAVID B. GOLUBCHIK

11 TODD M. ARNOLD

12 LEVENE, NEALE, BENDER, YOO

13 & GOLUBCHIK L.L.P.

14 Attorneys for Debtor and Debtor in Possession

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EXHIBIT "A"

Summary of SierraConstellation Partners Professional Fees by Consultant

For the Period May 1st through May 31st

<u>Consultant</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
Lawrence Perkins	CEO	\$790	9.50	\$7,505.00
Roger Gorog	Director	\$525	35.10	\$18,427.50
Colin Moran	Associate	\$235	17.10	\$4,018.50
			<u>61.7</u>	<u>\$29,951.00</u>

EXHIBIT "B"

Summary of SierraConstellation Partners Professional Fees by Activity

For the Period May 1st through May 31st

<u>Activity / Consultant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
<u>Business Operations, Cash Management & CRO Support</u>				
Lawrence Perkins	CEO	8.00	\$790	\$6,320
Roger Gorog	Director	34.10	\$525	\$17,903
Colin Moran	Associate	5.90	\$235	\$1,387
	<i>Activity Total</i>	48.00		\$25,609
<u>Case Administration</u>				
Lawrence Perkins	CEO	0.00	\$790	\$0
Roger Gorog	Director	0.00	\$525	\$0
Colin Moran	Associate	9.00	\$235	\$2,115
	<i>Activity Total</i>	9.00		\$2,115
<u>Court Hearing/341 Meetings/Preparation & Attendance at Hearings</u>				
Roger Gorog	Senior Director	0.00	\$525	\$0
Lawrence Perkins	CEO	1.50	\$790	\$1,185
Colin Moran	Associate	1.20	\$235	\$282
	<i>Activity Total</i>	2.70		\$1,467
<u>Invoices, Fees and Retention Applications</u>				
Roger Gorog	Senior Director	1.00	\$525	\$525
Lawrence Perkins	CEO	0.00	\$790	\$0
Colin Moran	Associate	1.00	\$235	\$235
	<i>Activity Total</i>	2.00		\$760

EXHIBIT "C"

Summary of SierraConstellation Partners Professional Fees by Professional Service
For the Period May 1st through May 31st

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Business Operations, Cash Management & CRO Support				
<i>Lawrence Perkins</i>				
5/2/2022	Correspondence with team re: various open workstreams to claims	1.00	\$790.00	\$790.00
5/2/2022	Review and signature of filing related to mechanics liens; correspondence re: same	1.00	\$790.00	\$790.00
5/5/2022	Review of MOR and signature of same	1.50	\$790.00	\$1,185.00
5/5/2022	Working with counsel re: motion related to mechanics liens	1.50	\$790.00	\$1,185.00
5/9/2022	Correspondence re: various items related to claims	1.00	\$790.00	\$790.00
5/11/2022	Correspondence and calls re: various claims issues	1.00	\$790.00	\$790.00
5/23/2022	CRO duties - review of correspondence and review and signature of motions	1.00	\$790.00	\$790.00
Lawrence Perkins Total				\$6,320.00
<i>Colin Moran</i>				
5/4/2022	Emails with Lockton to discuss insurance claim	0.50	\$235.00	\$117.50
5/5/2022	Teleconference with R. Gorog and K. Sliwerksi to discuss insurance claim	0.30	\$235.00	\$70.50
5/6/2022	Submit Payment for SCP	0.10	\$235.00	\$23.50
5/11/2022	Review of emails re: Vesta & Tax Returns	0.30	\$235.00	\$70.50
5/12/2022	Teleconference with R. Gorog and D. Golubchik re Insurance claim	0.30	\$235.00	\$70.50
5/12/2022	Emails with Lockton to discuss claim and appraisal request	0.30	\$235.00	\$70.50
5/13/2022	Teleconference with H. Grobstein and K. Boffil re Tax Returns	0.20	\$235.00	\$47.00
5/16/2022	Review emails re: Vesta	0.50	\$235.00	\$117.50
5/18/2022	Review Hankey Accounting emails and supporting documents	0.70	\$235.00	\$164.50
5/18/2022	Review emails re: Hankey payment and Inferno doc request	0.50	\$235.00	\$117.50
5/22/2022	Begin review of Inferno related Docs that support claim	1.00	\$235.00	\$235.00
5/24/2022	Emails re: tax and MSR filing	0.50	\$235.00	\$117.50
5/27/2022	Processes & emails re to Payment to Hankey	0.70	\$235.00	\$164.50
Colin Moran Total				\$1,386.50
<i>Roger Gorog</i>				
5/2/2022	Review changes to operating report	1.10	\$525.00	\$577.50
5/2/2022	Investigate vendor issues; read emails relating to potential claim	1.70	\$525.00	\$892.50
5/2/2022	Work on getting bank account access	2.20	\$525.00	\$1,155.00
5/3/2022	Work on and review and respond to various emails	2.10	\$525.00	\$1,025.00
5/3/2022	Coordinate call with bank for signature cards and account access	0.30	\$525.00	\$157.50
5/4/2022	Review emails from counsel regarding monthly reporting and suggested changes	1.30	\$525.00	\$682.50
5/4/2022	Review revised monthly report	0.50	\$525.00	\$262.50
5/5/2022	Work on bank account access	0.50	\$525.00	\$262.50
5/5/2022	Prepare for and attend call with insurance broker	2.10	\$525.00	\$1,102.50
5/6/2022	Review emails from counsel regarding mechanics liens and timing	0.60	\$525.00	\$315.00
5/9/2022	Review email from counsel regarding disbursements	0.50	\$525.00	\$262.50
5/10/2022	Discuss tax preparation and next steps for moving forward with filing	1.10	\$525.00	\$577.50
5/11/2022	Read and respond to emails from counsel regarding furniture and fixtures	1.30	\$525.00	\$682.50
5/12/2022	Various calls and emails related to vendor issues and potential insurance claim; call with counsel to discuss next steps	1.70	\$525.00	\$892.50
5/13/2022	Work on bank account access; send wet signature documents to bank	0.60	\$525.00	\$315.00
5/13/2022	Various emails to insurance broker regarding appraisals and potential claims	1.10	\$525.00	\$577.50
5/16/2022	Review emails from counsel regarding vendor claim	1.60	\$525.00	\$840.00
5/18/2022	Review draft MOR and cash balances	1.10	\$525.00	\$577.50
5/18/2022	Review lender balance and payoff request; read and review emails from counsel related to same	1.50	\$525.00	\$787.50
5/19/2022	Work on bank account setup and access	1.80	\$525.00	\$945.00
5/20/2022	Review emails from counsel regarding lender payoff and associated timing	1.10	\$525.00	\$577.50
5/21/2022	Review emails from counsel regarding lender payoff and disbursements	1.20	\$525.00	\$630.00
5/23/2022	Review draft motion to pay lender	0.80	\$525.00	\$420.00
5/24/2022	Discuss status of tax filings	0.60	\$525.00	\$315.00
5/25/2022	Review and approve payment	0.30	\$525.00	\$157.50
5/26/2022	Prepare for and attend hearing on distribution	1.10	\$525.00	\$577.50
5/26/2022	Review oppositions to motion to pay lender	2.10	\$525.00	\$1,102.50
5/27/2022	Work with bank to approve wire payment; work on wire limits and approval for distribution	2.20	\$525.00	\$1,155.00
Roger Gorog Total				\$17,902.50

Case Administration

Colin Moran

5/2/2022	Review documents and emails re: Vesta and Mechanics liens	0.50	\$235.00	\$117.50
5/3/2022	Review emails for specific Vesta contracts and information; compile into folders	1.80	\$235.00	\$423.00
5/4/2022	Complete Revised March MOR	1.70	\$235.00	\$399.50
5/5/2022	Meeting prep - review of Insurance documents and Vesta Claims	1.00	\$235.00	\$235.00
5/9/2022	Pull payment and invoice information for UST	0.80	\$235.00	\$188.00
5/12/2022	Review of emails and documents re: creditor claims and funding documents	1.00	\$235.00	\$235.00
5/18/2022	Compile Apr MOR and supporting documents	1.10	\$235.00	\$258.50
5/26/2022	Review Yogi and Inferno Opps to Hankey Pmt	1.10	\$235.00	\$258.50
		Colin Moran Total		\$2,115.00

Invoices, Fees and Retention Applications

Colin Moran

5/11/2022	Buildout of Monthly Staffing Report and related emails	1.00	\$235.00	\$235.00
		Colin Moran Total		\$235.00

Roger Gorog

5/9/2022	Review April fees and send email to UST with budget to actual comparison	0.60	\$525.00	\$315.00
5/9/2022	Review April invoice and associated schedules	0.40	\$525.00	\$210.00
		Roger Gorog Total		\$525.00

Court Hearing/341 Meetings/Preparation & Attendance at Hearings

Colin Moran

5/26/2022	Court Hearing re: Mechanics liens and LNBYG payment	0.50	\$235.00	\$117.50
5/26/2022	Court Hearing re: Hankey Payment	0.70	\$235.00	\$164.50
		Colin Moran Total		\$282.00

Lawrence Perkins

5/25/2022	Prep for and attendance at court hearings	1.50	\$790.00	\$1,185.00
		Lawrence Perkins Total		\$1,185.00

EXHIBIT "D"

Summary of SierraConstellation Partners Expenses by Category

For the Period May 1st through May 31st

<u>Reimbursable Expenses</u>	<u>Amount</u>
NA	\$0.00
Total Expenses	\$0.00

EXHIBIT "E"

Summary of SierraConstellation Partners Expenses by Detail
For the Period May 1st through May 31st

<u>Activity</u>	<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
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NA

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled **DEBTOR'S NOTICE OF MONTHLY FEE STATEMENT OF SIERRA CONSTELLATION PARTNERS, LLC [May 1, 2022 through May 31, 2022]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 14, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Kyra E Andrassy kandrassy@swelawfirm.com,
lgarrett@swelawfirm.com; gcruz@swelawfirm.com; jchung@swelawfirm.com
- Todd M Arnold tma@lnbyg.com
- Jerrold L Bregman jbregman@bg.law, ecf@bg.law
- Marguerite Lee DeVoll mdevoll@watttieder.com, zabrams@watttieder.com
- Karol K Denniston karol.denniston@squirepb.com,
travis.mcroberts@squirepb.com; sarah.conley@squirepb.com; karol-k-denniston-9025@ecf.pacerpro.com
- Oscar Estrada oestrada@ttc.lacounty.gov
- Danielle R Gabai dgabai@danninggill.com, dgabai@ecf.courtdrive.com
- Thomas M Geher tmg@jmbm.com,
bt@jmbm.com; fc3@jmbm.com; tmg@ecf.inforuptcy.com
- David B Golubchik dbg@lnbyg.com, stephanie@lnbyb.com
- James Andrew Hinds jhinds@hindslawgroup.com; mduran@hindslawgroup.com
- Robert B Kaplan rbk@jmbm.com
- Jane G Kearl jkearl@watttieder.com
- Jennifer Larkin Kneeland jkneeland@watttieder.com, zabrams@watttieder.com
- Michael S Kogan mkogan@koganlawfirm.com
- Noreen A Madoyan Noreen.Madoyan@usdoj.gov
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glenda.spratt@dentons.com; derry.kalve@dentons.com
- Samuel A Newman sam.newman@sidley.com, samuel-newman-2492@ecf.pacerpro.com; laefilingnotice@sidley.com
- Ryan D O'Dea rodea@shulmanbastian.com, lgauthier@shulmanbastian.com
- Sharon Oh-Kubisch sokubisch@swelawfirm.com,
gcruz@swelawfirm.com; 1garrett@swelawfirm.com; jchung@swelawfirm.com
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- Victor A Sahn vsahn@sulmeyerlaw.com,
pdillamar@sulmeyerlaw.com; pdillamar@ecf.inforuptcy.com; vsahn@ecf.inforuptcy.com; cblair@sulmeyerlaw.com; cblair@ecf.inforuptcy.com
- William Schumacher wschumac@milbank.com, autodocketcf@milbank.com
- David Seror dseror@bg.law, ecf@bg.law
- Zev Shechtman zshechtman@DanningGill.com,
danninggill@gmail.com; zshechtman@ecf.inforuptcy.com
- Mark Shinderman mshinderman@milbank.com,
dmuhrez@milbank.com; dlbatic@milbank.com
- Lindsey L Smith lls@lnbyb.com, lls@ecf.inforuptcy.com
- United States Trustee (LA) ustregion16.la.ecf@usdoj.gov

- **Genevieve G Weiner** gweiner@sidley.com, laefilingnotice@sidley.com; genevieve-weiner-0813@ecf.pacerpro.com
 - **Jessica Wellington** jwellington@bg.law, ecf@bg.law

2. SERVED BY UNITED STATES MAIL: On **June 14, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **June 14, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

10 | None

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

13 June 14, 2022 Lourdes Cruz /s/ Lourdes Cruz
Date Type Name Signature

In re Crestlloyd, LLC
D UST Receiver RSN + Amended 20
Largest
File No.: 9562

Debtor
Crestlloyd, LLC
c/o SierraConstellation Partners LLC
355 S. Grand Avenue Suite 1450
Los Angeles, CA 90071

Noreen A Madoyan
Office of the United States Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, CA 90017

Counsel For Receiver

Brutzkus Gubner Rozansky Seror
Weber LLP
David Seror/Jessica Wellington
21650 Oxnard Street, Suite 500
Woodland Hills, CA 91367

Biabani & Associates, Inc.
Attn: Alex Biabani
1600 Sawtelle Bl #104
Los Angeles, CA 90025

Bradford Sheet Metal
4164 Sopp Road
Mojave, CA 93501

Branden Williams
257 N. Cannon Dr., 2nd Fl.
Beverly Hills, CA 90210

C.G.S. Custom Glass Specialists
Attn: Tom Yang
4536 Ish Drive
Simi Valley, CA 93063

CAD Stone Works Inc.
Attn: Cesar Hernandez
4533 Van Nuys Bl. #201
Sherman Oaks, CA 91403

Centurion Air, LLC
Attn: Michael T. Pyle
13932 Arrow Creek Road
Draper, UT 84020

Davidson Accountancy Corp.
William N. Davidson, CPA
14011 Ventura Blvd., Ste. 302
Sherman Oaks, CA 91423

Creative Art Partners
6542 Hayes Dr.
Los Angeles, CA 90048

Italian Luxury Design
4 NE 39 St.
Miami, FL 33137

Jabs Pools and Spas, LLC
Attn: Georgina Rendon
8055 Matilija Ave.
Panorma City, CA 91402

Dennis Palma
146 Beach Way
Monterey, CA 93940

KN Coating
201 E. Tamarack Ave
Inglewood, CA 90301

LA DWP
P.O. Box. 30808
Los Angeles, CA 90030

Vesta (aka Showroom Interiors, LLC)
Attn: Julian Buckner
8905 Rex Road
Pico Rivera, CA 90660

Made by TSI, Inc.
888 Biscayne Blvd #209
Miami, FL 33132

Midland Contractors, Inc.
Attn: Bruce Partovi
Po Box 8312
Van Nuys, CA 91409

West Valley Green Landscaping, Inc.
14761 Tupper St.
Panorama City, CA 91402

The Vertex Companies, Inc.
12100 Wilshire Blvd 8th floor
Los Angeles CA 90025-0000

West Coast Gates
339 Isis Ave.
Inglewood, CA 90301

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